

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MICHIGAN

In the Matter of:

GOODRICH QUALITY THEATERS, INC.

Case No. 20-00759-swd
Chapter 11
Hon. Scott W. Dales

Debtor.

**NOTICE OF PROPOSED AGENDA OF MATTERS SCHEDULED
FOR HEARING ON MARCH 6, 2020 AT 10:00 A.M.**

The above captioned Debtor (the “Debtor”) submits the following proposed agenda for matters scheduled for hearing on March 6, 2020 at 10:00 A.M.

*****10:00 A.M. CALENDAR*****

A. Declaration of Robert Emmett Goodrich in Support of Chapter 11 Petition and First Day Motions [DN 45]

Status: Not in dispute. Filed in Support of remaining Motions.

B. Debtor’s Application to Retain Keller & Almassian, PLC as Counsel to the Debtor Nunc Pro Tunc [DN 46]

Status: To be adjourned for control. Application objection period pending.

C. Debtor’s Motion for an Order Authorizing Continued Use of its Existing Bank Accounts, Business Forms and Cash Management System [DN 47]

Objections/Responses Received.

1. Objection filed by the U.S. Trustee [DN 63]

Status: This matter is currently going forward. U.S. Trustee suggested edits to the proposed Order. Debtor incorporated those edits and anticipates the objection will be resolved prior to the scheduled hearing.

D. Debtor's Motion for An Order (A) Prohibiting Utilities from Terminating Services to the Debtor, and (B) Establishing Procedures for Resolving Disputes Relating to Adequate Assurance Requests [DN 48]

Objections/Responses Received.

1. Objection filed by the U.S. Trustee [DN 79]

Status: This matter is currently going forward. U.S. Trustee suggested edits to the proposed Order. Debtor incorporated those edits and anticipates the objection will be resolved prior to the scheduled hearing.

E. Debtor's First Day Motion for Entry of an Order (i) Authorizing Debtor to Pay Employee Obligations and Continue Employee Benefit Programs; (ii) Authorizing Debtor to Pay Certain Pre-Petition Tax Obligations; and (iii) Directing Financial Institutions to Honor Outstanding Employee-Obligation Payments [DN 49]

Objections/Responses Received.

1. Objection filed by the U.S. Trustee [DN 64]

Status: This matter is currently going forward. U.S. Trustee suggested edits to the proposed Order. Debtor incorporated those edits and anticipates the objection will be resolved prior to the scheduled hearing.

F. Debtor's Motion for an Order Extending the Time Deadline for Filing its Schedules and Statements of Financial Affairs [DN 50]

Objections/Responses Received.

1. Objection filed by the U.S. Trustee [DN 78]

Status: The Debtor and the U.S. Trustee have resolved this matter and will submit a proposed Order.

G. Debtor's Motion for Entry of an Order Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Professional and Committee Members [DN 51]

Status: To be adjourned for control. Debtor to file a Notice with Opportunity to Object.

H. Emergency Stipulated Motion to Authorize the Debtor to Use Certain Cash Collateral [DN 67]

Objections / Responses Received.

1. Objection filed by Creditor Spirit Master Funding X LLC [DN 88]
2. Objection filed by Creditor Bay City Mall Partners LLC [DN 93]
3. Omnibus Response filed by Debtor to both objections. [DN 95]
4. Debtor will present an amended budget through Friday, March 13, 2020.
5. Debtor will request a final hearing.
6. Debtor anticipates filing papers to approve a DIP Loan early next week.

Status: This matter is going forward.

I. Emergency Motion to address the following Critical Vendor Claims:

- a. Lionsgate;
- b. STX;
- c. Universal Film Exchanges, LLC;

d. Warner Brothers

###END OF AGENDA###

Dated: March 6, 2020

Respectfully Submitted,

KELLER & ALMASSIAN, PLC

By: /s/ Greg J. Ekdahl

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Proposed Counsel for the Debtor and Debtor in Possession